

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**BRANDON MENG**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 2:24-cv-199-KS-MTP**

**WILLIAM CAREY UNIVERSITY,  
Acting through its Division of the College of  
Osteopathic Medicine,  
ITALO R. SUBBARAO, D.O., and  
EDWARD FRIEDLANDER, M.D.**

**DEFENDANTS**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWERS  
OR OTHER RESPONSIVE PLEADINGS**

Defendants William Carey University and Italo R. Subbarao, D.O. (“Moving Defendants”) move for an extension of time to file answers or other responsive pleadings to Plaintiff Brandon Meng’s Complaint in this action [Dkt. #1], and in support hereof show unto the Court the following:<sup>1</sup>

1. Presently, Moving Defendants’ answers or other responsive pleadings to Plaintiff’s Complaint are due on February 19, 2025. Undersigned counsel for Moving Defendants are completing their investigation into Plaintiff’s Complaint and they have obligations in other cases that hamper the ability to meet that current February 19, 2025 deadline.

2. Moving Defendants respectfully move for an extension of time of twenty-one (21) days of their deadline under Fed. R. Civ. P. 12(a)(1)(A)(i), until Wednesday, March 12, 2025, to file their answers or other responsive pleadings to Plaintiff’s Complaint so that their undersigned counsel have adequate time to complete their investigation and prepare their answers or other responsive pleadings with their assistance.

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<sup>1</sup> Due to the brevity of this motion and the simple nature of the requested relief, Moving Defendants respectfully request that this Court waive the requirement of a separate memorandum brief in support thereof.

3. Plaintiff's counsel has been consulted regarding this request for an extension of time and confirms Plaintiff does not oppose it.

WHEREFORE, Defendants William Carey University and Italo R. Subbarao, D.O. respectfully request this Court grant them an additional twenty-one (21) days, until Wednesday, March 12, 2025, to file their answers or other responsive pleadings to Plaintiff Brandon Meng's Complaint [Dkt. #1].

This the 5th day of February, 2025.

Respectfully submitted,

**WILLIAM CAREY UNIVERSITY and ITALO  
R. SUBBARAO, D.O., DEFENDANTS**

By: /s/ Charles E. Cowan  
CHARLES E. COWAN (MSB #104478)

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I, Charles E. Cowan, hereby certify that I have electronically filed the foregoing with the Clerk of Court using the ECF system, which automatically sent email notification to all counsel of record.

This the 5th day of February, 2025.

s/ Charles E. Cowan  
CHARLES E. COWAN